

Report of Americell PA-3 LP)
Implementation plan for)
Wireless E911 Phase II)
Automatic Location Identification)

CC Docket No. 94-102

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Background/Contact Information

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E911 Phase II Location Technology Information

1) Type of Technology

Handset Based Solution

Americell PA-3 LP, Inc intends to implement this handset based technology based on the assumption that there will be a GPS type handset available before the FCC deadline of October 1, 2001. We are not aware of any manufacturer that has committed at this time to meeting the deadline, therefore we have not chosen a vendor. However, it is our opinion that in rural service areas, a GPS handset solution will provide much more reliable ALI.

To capture and transfer the GPS location information to PSAP we anticipate we will need to add software at the Mobile Switching Office as well as at the PSAP's E911 center. At this time we are not fully aware of the exact extent of these software requirements.

2) Testing and Verification

Americell PA-3 LP does not have a Phase II testing and verification plan in place at this time. We do intend to implement testing and verification that meets with or exceeds the FCC requirements outlined in OET Bulletin No. 71, issued April 12, 2000.

3) Implementation Details and Schedule

Americell PA-3 LP's plan is to deploy the handset based technology at the earliest possible date. We intend to begin purchasing only GPS capable handsets as soon as they become available, providing they are compatible with our TDMA 800Mhz system. We will simultaneously install any needed software and or hardware that may be required to facilitate Phase II technology.

4) PSAP Interface

We intend to install any required interfaces and coordinate the installation and testing of the interface with all PSAP's in our service area. It is also our intention to transmit the Phase II data through the existing public switched telephone service.

5) Existing Handsets

We currently have no Phase II capable handsets in our market today. We do intend to offer only the Phase II capable handset to new customers as soon as they become available. We will also insure compliance with the FCC order, regarding percentage of availability, by closely monitoring the penetration of the Phase II handsets. In order to achieve the proper penetration numbers we plan to offer incentives to our customers to "upgrade" their handset to a newer Phase II capable handset. We will closely monitor the process to always maintain full compliance.

6) Location of Non-Compatible Handsets

Americell PA-3 LP intends to continue to closely monitor the development of all available technologies. We contend that in a rural market, the best technology available today to meet the FCC requirements, must be a handset based solution. To our knowledge, there is no network based solution available that does not require some type of time and or distance measuring based on a minimum of two and preferably three network receivers. These receivers would need to be located at our cellular transmitter facilities to capture and transmit back to our switching office the received information. Our internal research indicates that in our market area, we would not be able to achieve the availability and accuracy required by the FCC using a network based technology. We are however, committed to providing the best possible E911 service available to the public. Because of this we intend to continue to research the possibility of a network based technology that would benefit all users of our system, regardless of handset type.

7) Other Information

Americell PA-3 LP has received no requests for Phase II service. We have been in contact with the appropriate officials within our service area regarding future E911 services.